

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
10

11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 **OMNIBUS SEALING STIPULATION**  
15 **REGARDING DKT. NOS. 2212 AND**  
16 **2213**

17 THIS DOCUMENT RELATES TO:  
18 ALL ACTIONS

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

19 Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order  
20 (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing  
21 Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively,  
22 "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation in  
23 connection with the Parties' Stipulation re YouTube Noncustodial Sources (ECF No. 2212) and  
24 Attachments 1-11 filed under seal (ECF No. 2213).

25 At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge  
26 designations and sealing in the future. Accordingly, the Parties stipulate to the following chart.  
27  
28

**I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS**

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
2213-1	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit A	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube's platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
2213-2	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit A-1	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube's platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
2213-3	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit B	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube's platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause	A party has not previously sought to seal the same information.

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
			competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 2.	
2213-4	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibit B-1	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 2.	A party has not previously sought to seal the same information.
2213-5	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibit C	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 2.	A party has not previously sought to seal the same information.
2213-6	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibit D	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause	A party has not previously sought to seal the same information.

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
			competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 3.	
2213-7	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibit D-1	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 3.	A party has not previously sought to seal the same information.
2213-8	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibit E	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 3.	A party has not previously sought to seal the same information.
2213-9	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibit E-1	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause	A party has not previously sought to seal the same information.

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
			competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 3.	
2213-10	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibit F	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 3.	A party has not previously sought to seal the same information.
2213-11	Evidentiary Stipulation and Proposed Order Regarding YouTube’s Production from Non-Custodial Sources, Exhibits F-1	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 4.	A party has not previously sought to seal the same information.

**IT IS SO STIPULATED AND AGREED.**

DATED: September 8, 2025

Respectfully submitted,

**WILSON SONSINI GOODRICH & ROSATI**

Professional Corporation

By: /s/ Christopher Chiou

Christopher Chiou (State Bar No. 233587)  
Matthew K. Donohue (State Bar No. 302144)  
WILSON SONSINI GOODRICH & ROSATI  
PC953 East Third Street, Suite 100  
Los Angeles, CA 90013  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329  
Email: cchiou@wsgr.com  
Email: mdonohue@wsgr.com

Brian M. Willen (*pro hac vice*)  
WILSON SONSINI GOODRICH & ROSATI PC  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019 Telephone: (212) 999-  
5800 Facsimile: (212) 999-5899 Email:  
bwillen@wsgr.com

Lauren Gallo White (State Bar No. 309075)  
Samantha A. Machock (State Bar No. 298852)  
WILSON SONSINI GOODRICH & ROSATI PC  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099  
Email: lwhite@wsgr.com  
Email: smachock@wsgr.com

*Attorneys for Defendants YouTube, LLC and  
Google LLC*

DATED: September 8, 2025

By: /s/ Lexi Hazam  
LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
55 Challenger Road, 6<sup>th</sup> floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100  
Facsimile: 973-679-8656  
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement  
Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT  
**BEASLEY ALLEN CROW METHVIN  
PORTIS & MILES, P.C.**  
234 Commerce Street  
Montgomery, AL 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
220 W. Garden Street, 9<sup>th</sup> Floor  
Pensacola, FL 32502  
Telephone: 850-316-9100  
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
Facsimile: 212-344-5461  
jbilsborrow@weitzlux.com

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 Madison Ave, 7<sup>th</sup> Floor  
New York, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 Broadway, Suite 2100  
Oakland, CA 94607

Telephone: 510-350-9717  
amm@classlawgroup.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street Suite 500  
Philadelphia, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN  
**RON AUSTIN LAW**  
400 MANHATTAN BLVD  
HARVEY, LA 70058 Telephone: 504-227-8100  
raustin@ronaustinlaw.com

PAIGE BOLDT  
**WATTS GUERRA LLP**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701 1100  
tcartmell@wcllp.com

SARAH EMERY  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
2380 Grandview Drive  
Ft. Mitchell, KY 41017  
Telephone: 888-606-5297  
semery@justicestartshere.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
600 West Main Street, Suite 100



1 Louisville, KY 40202  
2 Telephone: 859-578-4444  
rjohnson@justicestartshere.com

3 SIN-TING MARY LIU  
4 **AYLSTOCK WITKIN KREIS &**  
5 **OVERHOLTZ, PLLC**  
6 17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

7 JAMES MARSH  
8 **MARSH LAW FIRM PLLC**  
31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

11 HILLARY NAPPI  
12 **HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

14 EMMIE PAULOS  
15 **LEVIN PAPANTONIO RAFFERTY**  
16 316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

18 RUTH THI RIZKALLA  
19 **THE CARLSON LAW FIRM, P.C.**  
1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

21 ROLAND TELLIS  
22 DAVID FERNANDES  
23 **BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

26 MELISSA YEATES  
27 JOSEPH E. MELTZER  
28 **KESSLER TOPAZ MELTZER & CHECK, LLP**  
280 King of Prussia Road  
Radnor, PA 19087

Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20<sup>th</sup> St North Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership  
*Attorneys for Plaintiffs*

**ATTESTATION**

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 8, 2025

By: /s/ Christopher Chiou  
Christopher Chiou